

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KARIM P. NAJJAR, *et al.*, individually
and behalf of all others similarly situated,

Plaintiffs,

v.

RIAD SALAMEH, *et al.*,

Defendants.

Civil Action No. 1:24-cv-05043-CPO-EAP

**STIPULATION FOR AN EXTENSION OF TIME TO FILE,
AND A BRIEFING SCHEDULE FOR, MOTIONS TO DISMISS
THE FIRST AMENDED CLASS ACTION COMPLAINT**

Plaintiffs Karim P. Najjar, Halim Abou-Faycal, Younes Bazzi, Jacques Fontaine, Mounir Jermany, Ibrahim Khreibani, Bechara Rizk, Samar Shami, Joseph Tleiji, Salim Tleiji and Ramzi Zibaoui (“Plaintiffs”), individually and on behalf of a proposed class of similarly situated persons, and Defendants BDO USA, P.C., Deloitte LLP, Deloitte & Touche LLP, and Ernst & Young U.S. LLP (collectively, “U.S. Defendants”), submit this joint stipulation, by and through their undersigned counsel and pursuant to Section II of the Court’s Judicial Preferences, as follows:

1. WHEREAS, on September 13, 2024, the U.S. Defendants filed pre-motion letters in advance of their motions to dismiss the First Amended Class Action Complaint (“FAC”) (ECF Nos. 6, 9, 11) pursuant to a Stipulation So Ordered by the Court on August 15, 2024 (ECF No. 5);

2. WHEREAS, on September 19, 2024, the Court issued a Text Order (ECF No. 14), stating in part that the Court “does not believe that a pre-motion conference would be productive at this time” and that “the parties may proceed with filing their proposed motion if they choose to do so”;

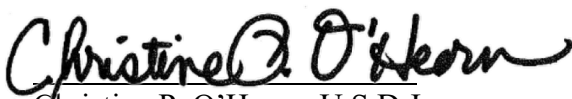
3. WHEREAS, counsel for Plaintiffs and counsel for the U.S. Defendants have conferred and agreed to: (i) an extension of the time within which the U.S. Defendants may file their motions to dismiss the FAC; and (ii) a briefing schedule for those motions;

4. WHEREAS, the U.S. Defendants preserve and have not waived any applicable defenses, including those pursuant to Federal Rule of Civil Procedure 12(b), such as for lack of jurisdiction;

5. THEREFORE, it is hereby stipulated and agreed that:

- a) The U.S. Defendants shall file their motions to dismiss the FAC on or before November 26, 2024.
- b) Plaintiffs shall file their oppositions to the motions on or before January 27, 2025.
- c) The U.S. Defendants shall file their replies in further support of their motions on or before February 25, 2025.

SO ORDERED.


Christine P. O'Hearn, U.S.D.J.

Dated: 9/25/24